

REMARKS

Initially, Applicants express appreciation to the Examiner for the detailed Official Action provided. Furthermore, Applicants express appreciation to the Examiner for acknowledgment that the drawings are acceptable in the Official Action, for the acknowledgment of Applicants' Claim for Priority and Receipt of the certified copies of the priority documents in the Official Action, and for the acknowledgment of Applicants' Information Disclosure Statement (IDS) filed on January 11, 2007 by return of the Form PTO-1449.

Upon entry of the present paper, paragraphs [0032] and [0033] of the Specification as filed on October 11, 2006 will have been amended to correct inadvertent typographical errors. The amendments are fully supported by the Specification, specifically, by Figures 4 and 6 of the Specification. No prohibited new matter has been added. Furthermore, upon entry of the present paper, claims 13-15, 17, and 19-23 will have been amended to enhance clarity. The present claim amendments do not narrow the scope of the claims, and they were not made in view of the prior art. Accordingly, no prosecution history estoppel should attach to the present claim amendments.

Thus, claims 13-26 are pending in the present application for consideration by the Examiner. Applicants address the rejections provided within the Official Action below and respectfully request reconsideration and withdrawal of the outstanding rejections pending in the present application together with an indication of the allowability of claims 13-26 (i.e., all pending claims) in the next Official communication. Such action is respectfully requested and is now believed to be appropriate for at least the reasons provided below.

35 U.S.C. § 103 Rejections

In the outstanding Official Action, claims 13, 14, and 23 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,075,899 to Yoshioka et al. (hereinafter "YOSHIOKA"). Additionally, claim 15 was rejected under 35 U.S.C. § 103(a) as being unpatentable over YOSHIOKA in view of U.S. Patent No. 6,745,320 to Mitsubishi (hereinafter "MITSUISHI"). Furthermore, claims 16-22 and 24-26 were rejected under 35 U.S.C. § 103(a) as being unpatentable over YOSHIOKA in view of MITSUISHI and further in view of U.S. Patent No. 6,807,311 to Callway et al. (hereinafter "CALLWAY").

Applicants respectfully traverse the Examiner's rejections under 35 U.S.C. § 103(a). Specifically, with respect to independent claims 13 and 23 (i.e., all independent claims pending in the present application), Applicants respectfully submit that the Examiner has failed to establish a *prima facie* case of obviousness. In particular, with respect to independent claim 13, Applicants submit that YOSHIOKA fails to render obvious at least an information processing device wherein the address conversion unit is operable to convert access addresses, so that a column address of data at a $(K+m)$ th column, where K and m are integers and $m \leq M$, of an L th line, and a column address of data at a K th column of an $(L+n)$ th line, where L and n are integers and $n \leq N$, become successive, and wherein $n=2n'$ and n' is an integer.

Furthermore, with respect to independent claim 23, Applicants submit that YOSHIOKA fails to render obvious at least a data access method including converting access addresses wherein the addresses are converted so that a column address of data at the $(K+m)$ th column, where K and m are integers and $m \leq M$, of the L th line, and a column

address of the data at the K th column of the $(L+n)$ line, where L and n are integers and $n \leq N$, become successive, and wherein $n=2n'$ and n' is an integer.

According to the above-mentioned features, a column address of an L th line and an $(L+n)$ th line (i.e., an $(L+2n')$ th line) become successive. In this regard, since n' is an integer, an L th line and an $(L+1)$ th line are not successive. For example, where $n'=1$, the column address of the L th line and the $(L+2)$ th line become successive. In other words, in the non-limiting example described above, the column addresses of every other line become successive. As a result, when the field is estimated, such as in motion compensation or motion estimation processing for an interlaced video, the unnecessary transfer load is reduced and the effective bandwidth is improved in a short burst-length access such as a rectangular access. Such an example is shown in Figure 6 of the present application.

Furthermore, according to the above-mentioned features wherein the addresses of every (n) th line (i.e., $(2n')$ th line) become successive column addresses, there is the non-limiting and advantageous effect that high-speed reading can be performed by avoiding a wasteful transfer (i.e., by skipping every second, fourth, or sixth line in a column).

In the outstanding Official Action, the Examiner asserts that YOSHIOKA discloses the above-mentioned features recited in independent claims 13 and 23. To the contrary, Applicants submit that YOSHIOKA merely discloses an image memory wherein blue chrominance components of an image are stored in even-numbered addresses and wherein red chrominance components of the image are stored in odd-numbered addresses (*see* YOSHIOKA, col.16, lns. 33-41). In other words, the blue chrominance components and red chrominance components of a pixel block are stored

next to each other in the same page using the even-numbered columns and odd-numbered columns, respectively (*see* YOSHIOKA, col. 16, lns. 53-57). Therefore, according to YOSHIOKA, the blue chrominance components and the red chrominance components included in the pixel block can be read in a single burst read (*see* YOSHIOKA, col. 16, lns. 62-64).

In this regard, Applicants submit that YOSHIOKA cannot reasonably be found to render obvious an address conversion unit, as recited by independent claim 13, that is operable to convert access addresses so that a column address of data at the $(K+m)$ th column of an L th line and a column address of data at a K th column of an $(L+n)$ th line become successive where $n=2n'$ and n' is an integer. Furthermore, YOSHIOKA cannot reasonably be found to render obvious converting access addresses, as recited by independent claim 23, wherein the addresses are converted so that a column address of data at the $(K+m)$ th column of the L th line and a column address of the data at the K th column of the $(L+n)$ th line become successive where $n=2n'$ and n' is an integer. To the contrary, Figure 9 of YOSHIOKA discloses that the column address of pixel $Y(15,0)$ (i.e., "000000_1111") and the column address of pixel $Y(0,1)$ (i.e., "000001_0000") are successive. In other words, YOSHIOKA merely discloses the column address of data at a $(K+m)$ th column of an L th line and a column address of data at the K th column of an $(L+1)$ th line as being successive. Therefore, according to YOSHIOKA, unnecessary transfer loads occur in the rectangular access when the field is estimated, such as in motion compensation or motion estimation processing for an interlaced video, and thus the advantage of reducing unnecessary transfer loads cannot be obtained.

Applicants further submit that MITSUISHI and CALLWAY each fail to disclose or suggest that which is lacking in YOSHIOKA. Specifically, Applicants submit that these references fail to disclose or render obvious at least the address conversion unit, as recited by independent claim 13, and the converting access addresses, as recited by independent claim 23. Accordingly, Applicants submit that even if one attempted to combine MITSUISHI and CALLWAY in the manner suggested by the Examiner, one would not arrive at the information processing device or data access method as recited by independent claims 13 and 23, respectively. Accordingly, the Examiner is respectfully requested to withdraw the 35 U.S.C. §103 rejections of claims 13 and 23

With respect to the Examiner's rejection of dependent claims 14-22 and 24-26, Applicants submit that these claims are all directly or indirectly dependent from one of allowable independent claims 13 and 23, which are allowable for at least the reasons discussed *supra*. Thus, these dependent claims are submitted to also be allowable for at least the reasons discussed *supra*. Furthermore, all dependent claims recite additional features which further define the present invention over the references of record..

Thus, Applicants respectfully submit that each and every pending claim of the present application (i.e., claims 13-26) meets the requirements for Patentability at least under 35 U.S.C. § 103, and respectfully request the Examiner to indicate the allowance of each and every pending claim in the present application.

CONCLUSION

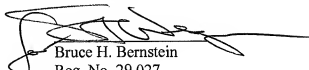
In view of the fact that none of the art of record, whether considered alone, or in any proper combination thereof, discloses or renders obvious the present invention, and in further view of the above remarks, reconsideration of the Examiner's action and allowance of the present application are respectfully requested and are believed to be appropriate.

Applicants note that the amendments to the claims are to be considered merely clarifying amendments that are cosmetic in nature, and are not intended to narrow the scope of the claims. Accordingly, this amendment should not be considered a decision by Applicants to narrow the claims in any way.

Should the Commissioner determine that an extension of time is required in order to render this response timely and/or complete, a formal request for an extension of time, under 37 C.F.R. §1.136(a), is herewith made in an amount equal to the time period required to render this response timely and/or complete. The Commissioner is authorized to charge any required extension of time fee under 37 C.F.R. §1.17 to Deposit Account No. 19-0089.

If there should be any questions concerning this application, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,
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